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December 29, 2022

Via ECF

The Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street, Room 1050
New York, New York 10007

Re: *In re Novartis and Par Antitrust Litigation*, No. 1:18-cv-04361-AKH, all actions

Dear Judge Hellerstein:

I write on behalf of Direct Purchaser Class Plaintiffs and Defendants Novartis Pharmaceuticals Corporation and Novartis AG ("Novartis") to respectfully request that the Court vacate its October 20, 2022 Scheduling Order and the December 29, 2022 and January 5, 2023 deadlines therein. ECF No. 584. Direct Purchaser Class Plaintiffs have settled with Novartis. *See* ECF No. 587-1. I also understand that each of the other Plaintiff groups has settled-in-principle with Novartis subject to negotiation and execution of a written agreement. Moreover, each Plaintiff group's claims against Defendant Par Pharmaceutical, Inc. have either been voluntarily dismissed (*see* ECF No. 585) or are subject to automatic bankruptcy stay. Accordingly the need for argument on any pending motion has been obviated pending negotiation and execution of written settlement agreements between the other Plaintiff groups and Novartis.

Respectfully submitted,

/s/ Dan Litvin
Dan Litvin

Garwin Gerstein & Fisher LLP
Interim Lead Counsel for the Direct Purchaser Class